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September 22, 2021

VIA ECF

Honorable J. Paul Oetken
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

United States v. Kukushkin, et al. 19 CR. 725 (JPO)

Dear Judge Oetken:

We are counsel for Andrey Kukushkin, a defendant in the above referenced matter. With **the consent** of the government and Pretrial Services, we write to request modification of Mr. Kukushkin's bail conditions to allow for travel to North Carolina and Virginia.

Throughout the entirety of his pretrial release, which has been close to two years, Mr. Kukushkin has been fully compliant with all terms and conditions set by this Court and Pretrial Services. On October 8, 2021, Mr. Kukushkin will be traveling from San Francisco to New York in anticipation of the trial. On his way, Mr. Kukushkin would like to stop in Virginia to pick up his son who is attending school there. Due to its location, Mr. Kukushkin will have to fly into the airport in Charlotte, North Carolina and then drive to the school where he intends to pick up his son, return to the airport and fly to New York. He will not be staying overnight in Virginia. Accordingly, **with the consent** of the government and Pretrial Services, Mr. Kukushkin respectfully requests that the terms and conditions of his release be amended to allow for his travel to North Carolina and Virginia.

In light of the foregoing, we respectfully request that the Court modify Mr. Kukushkin's release conditions as outlined above. We thank the Court for its consideration.

Respectfully submitted,

/s/ Gerald B. Lefcourt
Gerald B. Lefcourt

cc: All counsel (via ecf)
Bradley Wilson, United States Pretrial Services Officer (via email)
Joshua Rothman, United States Pretrial Services Officer (via email)